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July 11, 2023

VIA ECF AND FEDEX

Hon. Paul A. Crotty
United States District Court, Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007
CrottyNYSDChambers@nysd.uscourts.gov

Re: *Caballero v. Fuerzas Armadas Revolucionarias de Colombia*, No. 1:20-mc-00249-PAC

Dear Judge Crotty:

We represent Interested Party LDC Supply International, LLC (“LDC”) in the above-captioned action. Pursuant to Rules 1(A) and (E) of your Individual Practices, we respectfully request a 14-day extension of time in which to file the LDC and Plaintiff’s third joint status report in this matter, to and including July 26, 2023. Unless extended, the current deadline is July 12, 2023. This Court previously granted one extension to file this status report, as requested in the parties’ second joint status report. ECF No. 99. Plaintiff has consented to this request.

Good cause exists for the requested extension in light of recent developments in *Caballero v. Fuerzas Armadas Revolucionarias de Colombia*, No. 20-mc-40-LJV (W.D.N.Y.). Plaintiff filed a notice of voluntary dismissal in that action on July 1, 2023. On July 10, 2023, Judge Vilardo issued an order vacating all orders in that action, vacating the notice of voluntary dismissal, deeming the pending motion to quash withdrawn, and holding the action in abeyance pending the Second Circuit’s decision in *Havlish v. Islamic Emirate of Afghanistan*, No. 23-258 (2d Cir.), in which opening briefs were filed on June 30, 2023. *See* Text Order, ECF No. 144, *Caballero v. Fuerzas Armadas Revolucionarias de Colombia*, No. 20-mc-40 (LJV) (W.D.N.Y. July 10, 2023).

Hon. Paul A. Crotty
July 11, 2023
Page 2

LDC requires more time to consider its position on whether the LDC Stay Order (ECF No. 81) should continue in light of these developments. Accordingly, and for the reasons stated above, LDC respectfully requests a 14-day extension of time, to and including July 26, 2023, in which to file the parties' third joint status report.

Respectfully,

/s/ Samuel Hall
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